

METHFESSEL & WERBEL, ESQS.  
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Attorneys for BMS Catastrophe, Inc.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SERGIO GALLEGOS AND NELLY  
CABRERA,

Plaintiff,

-AGAINST-

BROOKFIELD FINANCIAL  
PROPERTIES, L.P., BLACKMON-  
MOORING-STEAMATIC  
CATASTROPHE, INC., D/B/A BMS  
CAT., HILLMAN ENVIRONMENTAL  
GROUP, LLC. AND TRIBECA  
LANDING, LLC.,

Defendants.

INDEX NO.: 07CV8728

21 MC 102 (AKH)

**NOTICE OF ADOPTION OF ANSWER  
TO MASTER COMPLAINT**

PLEASE TAKE NOTICE THAT Defendant, BMS Catastrophe, Inc. s/h/a Blackmon-Mooring-Steamatic Catastrophe, Inc. d/b/a BMS Catastrophe, by their attorneys, Methfessel & Werbel, as and for their response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above referenced action, hereby adopts their Answer and defenses to the Master Complaint, dated July 26, 2007, which was filed in the matter of: *In Re World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH)*.

To the extent that Defendant's Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above captioned matter, Defendant, BMS Catastrophe, Inc.,

denies knowledge or information sufficient to form a belief as to the truth of such specific allegations.

WHEREFORE, the defendant, Defendant, BMS Catastrophe, Inc., demands judgment dismissing the above captioned action as against them, together with costs, disbursements and such other and further relief as this Court deems just and proper.

DATED: New York, New York  
October 30, 2007

**METHFESSEL & WERBEL, ESQS.**  
Attorneys for BMS Catastrophe



By: \_\_\_\_\_  
Frank J. Keenan (FK 8922)  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies as follows:

1. I am employed by the law firm of Methfessel & Werbel.
2. On October 30, 2007 the undersigned prepared and forwarded copies of the within Notice of Adoption , via ECF, to the following parties:

David L. Kremen, Esq.  
Oshman & Mirisola, LLP  
42 Broadway - 10th Fl.  
New York, NY 10004  
Attorneys for: Plaintiff

All Defense Counsel

3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.



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Frank J. Keenan